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*Attorneys for Plaintiff*  
*German Barajas*

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

GERMAN BARAJAS, an individual,

Plaintiff,

v.

BYRNECUT US CORPORATION, a Nevada  
corporation,

Defendant.

Case No.: 2:25-cv-00473-RFB-MDC

**STIPULATION AND ORDER TO  
EXTEND TIME FOR DEFENDANT  
BYRNECUT US CORPORATION TO  
FILE RESPONSIVE PLEADING TO  
COMPLAINT**

**(FIRST REQUEST)**

1 Pursuant to Local Rules 6-1 and 6-2, Plaintiff German Barajas (“Plaintiff”) and Defendant  
2 Byrncut US Corporation (“Byrncut”) and together with Plaintiff, the “Parties”) stipulate and agree  
3 as follows:

4 1. On or about April 3, 2025, Byrncut was served with the Summons and Complaint for  
5 the above-referenced matter. [ECF No.6]

6 2. On April 17, 2025, counsel for Byrncut conferred with Plaintiff’s counsel to request  
7 that the Parties agree to extend Byrncut’s deadline to file a responsive pleading while it continues to  
8 gather further information regarding Plaintiff’s claims and obtains local counsel.

9 3. On April 17, 2025, the Parties agreed that good cause exists to extend Byrncut’s  
10 responsive pleading deadline to allow Byrncut to gather information and obtain local counsel.

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1           4.       The Parties agreed to extend the deadline for Byrncut to file its responsive pleading  
2 to May 15, 2025.

3           5.       This stipulation is made in good faith and not for the purpose of delay.

4           6.       This is the first stipulated request to extend Byrncut's responsive pleading deadline.

5       **NOW, THEREFORE, IT IS HEREBY STIPULATED THAT:**

6           Byrncut's time to file a responsive pleading to Plaintiff's Complaint is extended. Byrncut  
7 shall file its responsive pleading on or before May 15, 2025.

8       DATED this 28<sup>th</sup> day of April, 2025.

9       /s/ Michael A. Burnette

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26       Attorneys for Defendant Byrncut  
27       US Corporation

28       **ORDER**

IT IS SO ORDERED:

29       Hon. Maximiliano D. Couvillier III

30       United States Magistrate Judge

31       DATED: 4/30/2025